

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A.;)	
BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A. RETIREMENT)	
ACCOUNT FUND;)	
BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A. PENSION FUND;)	
BOARD OF TRUSTEES of the PLUMBERS)	CIVIL ACTION
LOCAL UNION NO. 93 U.A. HEALTH AND)	
WELFARE FUND;)	
BOARD OF TRUSTEES of the JOINT)	NO. 08-C-3254
APPRENTICESHIP COMMITTEE FUND of the)	
PLUMBING & HEATING INDUSTRY OF LAKE)	
AND McHENRY COUNTIES; and)	JUDGE: LEFKOW
The INDUSTRY ADVANCEMENT FUND;)	
)	
Plaintiffs,)	MAGISTRATE JUDGE: VALDEZ
)	
vs.)	
)	
HIGH-TECH MECHANICAL, INC.,)	
an Illinois Corporation; and)	
TOM BLANCHETTE,)	
an individual,)	
)	
Defendants.)	

MOTION FOR DEFAULT JUDGMENT

Now come Plaintiffs, the BOARD OF TRUSTEES of the PLUMBERS LOCAL UNION NO. 93 U.A., *et al.*, by and through their attorneys, JOHNSON & KROL, LLC, and moves this Honorable Court for entry of Default Judgment in favor of Plaintiffs and against Defendant HIGH-TECH MECHANICAL. INC., (“HIGH-TECH”) and TOM BLANCHETTE (“BLANCHETTE”) pursuant to Rule 55(b) of the Federal Rules of Civil Procedure and in support thereof, states as follows:

1. On June 6, 2008, Plaintiffs filed their Initial Complaint in the above-captioned matter.
2. On June 13, 2008, copies of the Summons and Complaint were served upon HIGH-TECH

via corporate service by leaving a true and correct copy of said documents with BLANCHETTE, the head project manager of HIGH-TECH. (Affidavit of Service attached as Exhibit 1).

3. On that same day, copies of the Summons and Complaint were served upon BLANCHETTE via personal service by handing a true and correct copy of said documents to Defendant BLANCHETTE. (Affidavit of Service attached as Exhibit 2).
4. The Defendants did not file an Answer or otherwise respond to the Complaint within 20 days of June 13, 2008, the date the Defendants were served with the Summons and Complaint (Fed. R. Civ. P. 12(a)(3)).
5. This case involves unpaid contributions and wage deductions. (Plaintiffs' Complaint ¶ 7).
6. The amount of contributions and wage deductions due and owing to the Plaintiffs is determined by the number of hours worked by covered employees under the Collective Bargaining Agreement and Trust Agreements. (Plaintiffs Complaint ¶ 7).
7. Defendant HIGH-TECH failed to submit contributions for the period of September 1, 2007 through February 29, 2008, resulting in outstanding contributions, liquidated damages, and interest charges in the amount of \$12,850.00. (Affidavit of Lyman Behrens attached as Exhibit 3).
8. Thereafter, Defendants HIGH-TECH and BLANCHETTE signed a Settlement Agreement with the Trust Funds wherein Defendant BLANCHETTE agreed to be personally liable for the obligations of HIGH-TECH.
9. Defendants HIGH-TECH and BLANCHETTE have failed to make any payments toward the unpaid contributions, liquidated damages or interest, and therefore the entire amount of \$12,850.00 remains unpaid.
10. Defendants HIGH-TECH and BLANCHETTE currently owe the Plaintiffs reasonable

attorney's fees and costs in the amount of \$3,822.50 for the period of February 11, 2008 through the present. (Affidavit of William P. Callinan attached as Exhibit 4).

11. The Court may render a Default Judgment against a party who has not filed a responsive pleading or otherwise defended the suit. (Fed. R. Civ. P. 55(a)(b)(2)).
12. The total principal balance due and owing to the Plaintiffs including contributions, liquidated damages, interest and attorney's fees is \$16,672.50. (Affidavit of Lyman Behrens attached as Exhibit 3).
13. Plaintiffs respectfully request this Honorable Court enter Default Judgment in favor of Plaintiffs and against the Defendants in the amount of \$16,672.50.
14. A draft Default Judgment Order is attached hereto as Exhibit 5.

WHEREFORE, Plaintiffs pray that this Honorable Court enter an Order of Default Judgment in favor of Plaintiffs and against Defendants HIGH-TECH and BLANCHETTE in the amount of \$16,672.50.

Respectfully submitted,

JOHNSON & KROL, LLC

By: /s/ William P. Callinan - 6292500
One of Plaintiffs' Attorneys

William P. Callinan
ATTORNEY FOR PLAINTIFFS
Johnson & Krol, LLC
208 South LaSalle Street, Suite 1602
Chicago, Illinois 60604
(312) 372-8587

RETURN OF SERVICE

Service of the Summons and complaint was made by me ⁽¹⁾	DATE <i>6/13/08 at 2:29 pm</i>
NAME OF SERVER (PRINT) TERRANCE DUBOIS	TITLE PRIVATE INVESTIGATOR

Check one box below to indicate appropriate method of service

 Served personally upon the defendant. Place where served: _____ Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: _____

 Returned unexecuted: _____

Other (specify): CORPORATE SERVICE TO TOM BLANCHETTE, PRESIDENT
TOM BLANCHETTE WAS SERVED AT 296 S. KINZIE AVE BRADLEY, IL
TOM BLANCHETTE IS A WHITE MALE AGE 58, APPROXIMATELY 5'10"
MEDIUM BUILD, APPROXIMATELY 190 lbs and Brown Hair.

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on 6/13/08
Date*Terrance Dubois*
Signature of ServerPo Box 581 CULTON, IL 60927
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT

1

AO 440 (Rev. 05/00) Summons in a Civil Action.

RETURN OF SERVICE

Service of the Summons and complaint was made by me ⁽¹⁾	DATE	6/13/08 at 2:29 pm
NAME OF SERVER (PRINT) TERRANCE DUBOIS	TITLE	PRIVATE INVESTIGATOR

Check one box below to indicate appropriate method of service

- Served personally upon the defendant. Place where served:

Tony BLANCHETTE IS A White male age 58, approximately 5'10", medium build, approximately 190 lbs. and brown hair.

- Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.

Name of person with whom the summons and complaint were left: _____

- Returned unexecuted: _____
- _____
- _____

- Other (specify): _____
- _____
- _____

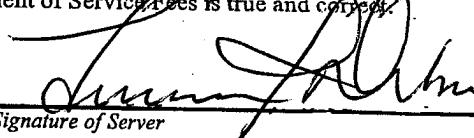
STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on 6/13/08
Date


Signature of Server

Po Box 581 CUFTON, IL 60927
Address of Server

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

EXHIBIT

tabler

2

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BOARD OF TRUSTEES of the PLUMBERS)
LOCAL UNION NO. 93 U.A.;)
BOARD OF TRUSTEES of the PLUMBERS)
LOCAL UNION NO. 93 U.A. RETIREMENT)
ACCOUNT FUND;)
BOARD OF TRUSTEES of the PLUMBERS)
LOCAL UNION NO. 93 U.A. PENSION FUND;)
BOARD OF TRUSTEES of the PLUMBERS)
LOCAL UNION NO. 93 U.A. HEALTH AND) CIVIL ACTION
WELFARE FUND;)
BOARD OF TRUSTEES of the JOINT)
APPRENTICESHIP COMMITTEE FUND of the)
PLUMBING & HEATING INDUSTRY OF LAKE)
AND McHENRY COUNTIES; and)
The INDUSTRY ADVANCEMENT FUND;) NO. 08-C-3254
Plaintiffs,) JUDGE: LEFKOW
vs.) MAGISTRATE JUDGE: VALDEZ
HIGH TECH MECHANICAL, INC.,)
an Illinois Corporation; and)
TOM BLANCHETTE,)
an individual,)
Defendants.)

AFFIDAVIT OF LYMAN BEHRENS

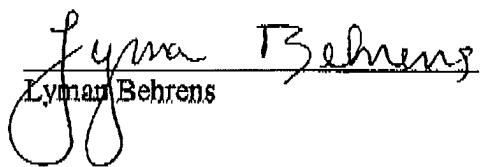
I, Lyman Behrens, hold the title of Benefit Funds Manager for the PLUMBERS LOCAL UNION NO.93 U.A. RETIREMENT ACCOUNT FUND; PLUMBERS LOCAL UNION NO.93 U.A. PENSION FUND; PLUMBERS LOCAL UNION NO.93 U.A. HEALTH AND WELFARE FUND; JOINT APPRENTICESHIP COMMITTEE FUND of the PLUMBING & HEATING INDUSTRY OF LAKE AND McHENRY COUNTIES; (hereinafter referred to as "Trust Funds"). Being first duly sworn and upon oath state that to the best of my knowledge the following is an accurate statement as to Defendant HIGH-TECH's and BLANCHETTE's



delinquency in the above captioned matter;

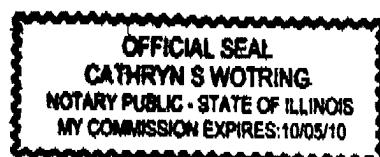
1. Defendant HIGH-TECH failed to submit contributions for the period of September 1, 2007 through February 29, 2008, resulting in outstanding contributions, liquidated damages, and interest charges in the amount of \$12,850.00.
2. On or about April 1, 2008, the Trust Funds entered into a Settlement Agreement with Defendants HIGH-TECH, and BLANCHETTE personally.
3. The terms of the Settlement Agreement required HIGH-TECH and BLANCHETTE to pay off the principal balance of \$12,850.00 over a 6 month period, and provided that BLANCHETTE shall be individually liable for all of the obligations of Defendant HIGH-TECH.
4. Defendants HIGH-TECH and BLANCHETTE have failed to make any payments under the Settlement Agreement and therefore the entire amount of \$12,850.00 remains unpaid.
5. Defendants currently owe the Plaintiffs reasonable attorney fees and costs in the amount of \$3,822.50 for the period of February 11, 2008 through the present.
6. The total principal balance due and owing to the Plaintiffs including contributions, liquidated damages, interest and attorney's fees is \$16,672.50.

Further affiant saith not.


Lynn Behrens

Subscribed and sworn
Before me this 9
day of July, 2008.


CATHRYN S. WOTRING
Notary Public



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BOARD OF TRUSTEES of the PLUMBERS)	
LOCAL UNION NO. 93 U.A.;)	
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LOCAL UNION NO. 93 U.A. HEALTH AND)	
WELFARE FUND;)	
BOARD OF TRUSTEES of the JOINT)	
APPRENTICESHIP COMMITTEE FUND of the)	
PLUMBING & HEATING INDUSTRY OF LAKE)	
AND McHENRY COUNTIES; and)	JUDGE: LEFKOW
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)	
Plaintiffs,)	MAGISTRATE JUDGE: VALDEZ
)	
vs.)	
)	
HIGH-TECH MECHANICAL, INC.,)	
an Illinois Corporation; and)	
TOM BLANCHETTE,)	
an individual,)	
)	
Defendants.)	

**AFFIDAVIT OF WILLIAM P. CALLINAN
IN SUPPORT OF ATTORNEY'S FEES AND COSTS**

I, William P. Callinan, hold the title of Associate Attorney at the law firm of Johnson & Krol, LLC. Being first duly sworn, on oath deposes and states that to the best of my knowledge, the following is an accurate statement as to the attorney's fees and costs the Plaintiffs have incurred in the above-captioned matter:



6/30/2008
2:34 PMJohnson & Krol, LLC
Listing

Page 1

Selection Criteria

Ref# Selection Include: High Tech Mechanical, Inc.

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
27132 TIME 2/11/2008 Billed G:11602 Telephone conf. w/collection referral.	JEM tc 2/20/2008 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	210.00 T@1	35.70
27135 TIME 2/12/2008 Billed G:11602 Search: IL corporate search w/state; Draft demand letter to contractor.	JEM Research 2/20/2008 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	210.00 T@1	105.00
27235 TIME 2/13/2008 Billed G:11602 Status: add company to report; Calendar expiration date give on demand letter.	WPC Status 2/20/2008 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	185.00 T@1	31.45
27560 TIME 2/26/2008 Billed G:11637 Telephone conf. w/contractor; Memo to file.	JEM tc 3/18/2008 93 TF High Tech Mechanical, In	0.33 0.00 0.00 0.00	210.00 T@1	69.30
27798 TIME 2/27/2008 Billed G:11637 Review incoming correspondence from contractor; Conf. w/Joe.	WPC Review 3/18/2008 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50
27566 TIME 2/27/2008 Billed G:11637 Review correspondence from contractor; Conf w/Will. High Tech Mechanical, In	JEM Review 3/18/2008 93 TF High Tech Mechanical, In	0.33 0.00 0.00 0.00	210.00 T@1	69.30
27815 TIME 2/29/2008 Billed G:11637 Review correspondence; T/C to contractor.	WPC Review 3/18/2008 93 TF High Tech Mechanical, In	0.33 0.00 0.00 0.00	185.00 T@1	61.05
27835 TIME 3/4/2008 Billed G:11637 Tel. conf. with contractor.	WPC tc w/contrac 3/18/2008 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	185.00 T@1	31.45
27840 TIME 3/5/2008 Billed G:11637 Telephone conf. w/Tom B from High Tech; Draft settlement agreement & calculate delinquency; Received & reviewed Jan & Feb contribution reports.	WPC tc 3/18/2008 93 TF High Tech Mechanical, In	1.67 0.00 0.00 0.00	185.00 T@1	308.95

6/30/2008
2:34 PMJohnson & Krol, LLC
Listing

Page 2

Slip ID	Dates and Time	Description	Timekeeper	Units	Rate	Slip Value
			Activity	DNB Time	Rate Info	
			Client	Est. Time	Bill Status	
			Reference	Variance		
27848	TIME 3/6/2008	Billed G:11637 Complete drafting settlement agreement; Draft payment schedule; T/C with Lyman @ fund office.	WPC complete 93 TF High Tech Mechanical, In	0.67 0.00 0.00 0.00	185.00 T@1	123.95
28072	TIME 3/6/2008	Billed G:11637 Begin to review/edit settlement agreement for Will.	JEM Review 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	210.00 T@1	35.70
28078	TIME 3/10/2008	Billed G:11637 Complete review/edit settlement agreement for Will; Conf. w/Will; Revise amortization schedule.	JEM complete 93 TF High Tech Mechanical, In	0.67 0.00 0.00 0.00	210.00 T@1	140.70
27867	TIME 3/10/2008	Billed G:11637 Revisions to settlement agreement; Draft security agreement; Draft letter w/settlement agreements.	WPC Revise 93 TF High Tech Mechanical, In	1.00 0.00 0.00 0.00	185.00 T@1	185.00
28835	TIME 4/4/2008	Billed G:11676 Review correspondence from company; Draft letter to High Tech Mechanical, In Lyman with settlement agreement & first payment; Draft letter to Lynn with Settlement Agreement.	WPC Review 93 TF High Tech Mechanical, In	1.00 0.00 0.00 0.00	185.00 T@1	185.00
28214	TIME 4/4/2008	Billed G:11676 Conference w/WPC Re: Settlement Agreement	JEM Conference 93 TF High Tech Mechanical, In	0.33 0.00 0.00 0.00	210.00 T@1	69.30
28313	EXP 4/7/2008	Billed G:11676 U.C.C. Financing Statement filed with Secretary of State.	J&K UCC State 93 TF High Tech Mechanical, In	1	21.00	21.00
28288	TIME 4/7/2008 12:59 PM	Billed G:11676 Draft UCC Form 1 Statement File UCC Form 1 filing statement t/c with High Tech	WPC Draft 4/18/2008 93 TF High Tech Mechanical, In	0.83 0.00 0.00 0.00	185.00 T@1	153.55
29029	TIME 4/16/2008	Billed G:11702 Telephone conference with Fund Office Draft letter to Fund Fax letter	WPC tc 5/20/2008 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50

6/30/2008
2:34 PMJohnson & Krol, LLC
Listing

Page 3

Slip ID	Dates and Time	Timekeeper	Units	Rate	Slip Value
	Posting Status	Activity	DNB Time	Rate Info	
	Description	Client	Est. Time	Bill Status	
29074	TIME 4/17/2008 Billed G:11702	WPC tc 93 TF Telephone conference with Fund Office regarding Settlement	0.17 0.00 0.00 0.00	185.00 T@1	31.45
29364	TIME 4/25/2008 Billed G:11702	JEM Conference 5/20/2008 93 TF Conference with WPC Re: status of Settlement	0.17 0.00 0.00 0.00	210.00 T@1	35.70
29367	TIME 4/25/2008 Billed G:11702	WPC Conference 5/20/2008 93 TF Conference with JEM regarding possible bond claim	0.17 0.00 0.00 0.00	185.00 T@1	31.45
29384	TIME 4/28/2008 Billed G:11702	JEM Conference 5/20/2008 93 TF Conference with WPC Re: delinquency and potential bond claim	0.17 0.00 0.00 0.00	210.00 T@1	35.70
29577	TIME 5/5/2008 Billed G:11702	JEM tc client 5/20/2008 93 TF Tel. conf. with fund office Re: returned check	0.17 0.00 0.00 0.00	210.00 T@1	35.70
29660	TIME 5/7/2008 Billed G:11702	WPC tc 5/20/2008 93 TF Telephone conference with Contractor regarding bounced settlement check and missing settlement payment	0.33 0.00 0.00 0.00	185.00 T@1	61.05
29999	TIME 5/15/2008 Billed G:11702	WPC tc 5/20/2008 93 TF Telephone conference with Contractor regarding missing settlement payments and bounced check; Discussion on possible payment options.	0.33 0.00 0.00 0.00	185.00 T@1	61.05
30197	TIME 5/20/2008 WIP	WPC tc 93 TF Telephone conference with Contractor	0.17 0.00 0.00 0.00	185.00 T@1	31.45
30307	TIME 5/22/2008 WIP	JEM Conference 93 TF Conference with WPC Re: filing suit	0.17 0.00 0.00 0.00	210.00 T@1	35.70
30345	TIME 5/23/2008 WIP	WPC Continue 93 TF Continue drafting Complaint Letter to Contractor Telephone conference with Contractor	0.67 0.00 0.00 0.00	185.00 T@1	123.95

6/30/2008
2:34 PMJohnson & Krol, LLC
Listing

Page 4

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
30397 TIME 5/27/2008 WIP Draft Complaint against High-Tech Mechanical Telephone conference with Fund Office	WPC Draft 93 TF High Tech Mechanical, In	1.33 0.00 0.00 0.00	185.00 T@1	246.05
30398 TIME 5/27/2008 WIP Draft letter to Fund Office with Settlement Agreements Email correspondence with Fund Office	WPC Draft 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50
30600 TIME 6/3/2008 WIP E-mail correspondence with Fund office. Telephone conference with Fund office. Continue drafting complaint	WPC e-mail 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50
30645 TIME 6/4/2008 WIP Review correspondence from Fund office Revise and finalize the Complaint and exhibits	WPC Review 93 TF High Tech Mechanical, In	0.67 0.00 0.00 0.00	185.00 T@1	123.95
30679 TIME 6/5/2008 WIP Draft Summons and Civil Cover Sheet Revise Complaint per Conference with JEM Scan and Efile Complaint and Exhibits	WPC Draft 93 TF High Tech Mechanical, In	1.67 0.00 0.00 0.00	185.00 T@1	308.95
30673 TIME 6/5/2008 WIP Conference with WPC	JEM Conference 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	210.00 T@1	35.70
30670 TIME 6/5/2008 WIP Review and revise Complaint	JEM Review 93 TF High Tech Mechanical, In	0.67 0.00 0.00 0.00	210.00 T@1	140.70
30690 TIME 6/6/2008 10:15 AM WIP Draft letter to process server and prepare documents for service.	Clerk - JAK Draft 93 TF High Tech Mechanical, In	0.42 0.00 0.00 0.00	80.00 T@1	33.60
30774 TIME 6/9/2008 WIP Review Court correspondence Conference with JEM	WPC Review 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	185.00 T@1	31.45

6/30/2008
2:34 PMJohnson & Krol, LLC
Listing

Page 5

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
31073 TIME 6/13/2008 WIP Telephone conference with Contractor regarding pending lawsuit (x2)	WPC tc 93 TF High Tech Mechanical, In	0.17 0.00 0.00 0.00	185.00 T@1	31.45
31291 TIME 6/20/2008 WIP Telephone conference with contractor regarding payment of delinquencies review correspondence from Contractor	WPC tc 93 TF High Tech Mechanical, In	0.33 0.00 0.00 0.00	185.00 T@1	61.05
31333 TIME 6/23/2008 WIP Court Filing: affidavits of service for High Tech and Blanchette.	Clerk - JAK Court file 93 TF High Tech Mechanical, In	0.25 0.00 0.00 0.00	80.00 T@1	20.00
31416 TIME 6/24/2008 WIP Telephone conference with Contractor regarding mechanics liens review correspondence from Contractor Research regarding enforcement of Mechanics liens (subrogation rights)	WPC tc 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50
31500 EXP 6/24/2008 WIP Process ServiceFee: to High Tech and Tom Blanchette on 6/13/08	J&K Process Service 93 TF High Tech Mechanical, In	1	125.00	125.00
31553 TIME 6/27/2008 WIP Draft Motion for Default Judgment	WPC Draft 93 TF High Tech Mechanical, In	0.50 0.00 0.00 0.00	185.00 T@1	92.50
Grand Total	Billable Unbillable Total	19.71 0.00 19.71		3822.50 0.00 3822.50

Total Attorneys' Fees to Date = \$3,822.50

GRAND TOTAL = \$3,822.50

Further, the affiant saith not.

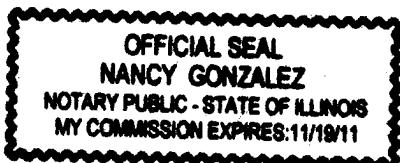
Subscribed and sworn
Before me this 7th day of
July, 2008.

Nancy Gonzalez

Notary Public

William P. Callinan

Mr. William P. Callinan



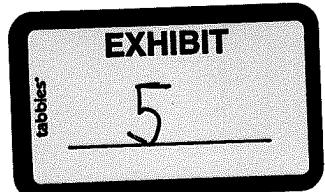
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Plaintiffs,)	MAGISTRATE JUDGE: VALDEZ
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vs.)	
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HIGH-TECH MECHANICAL, INC.,)	
an Illinois Corporation; and)	
TOM BLANCHETTE,)	
an individual,)	
)	
Defendants.)	

DEFAULT JUDGMENT ORDER

Default Judgment is hereby entered in favor of Plaintiffs and against Defendants HIGH-TECH MECHANICAL, INC (“HIGH-TECH”) and TOM BLANCHETTE (“BLANCHETTE”) as follows:

1. Default Judgment is entered in favor of Plaintiffs and against Defendants HIGH-TECH and BLANCHETTE jointly and severally.
2. Defendants HIGH-TECH and BLANCHETTE are jointly and severally ordered to pay to Plaintiffs all known unpaid contributions, liquidated damages and interest that accrued



during the period of September 1, 2007 through the February 29, 2008 in the amount of \$12,850.00.

3. Defendants HIGH-TECH and BLANCHETTE are jointly and severally ordered to pay to Plaintiffs reasonable attorney's fess and costs incurred by the Plaintiffs in the amount of \$3,822.50 pursuant to the Collective Bargaining Agreement, Trust Agreements and 29 U.S.C. § 1132 (g)(2)(D).
4. The total principal balance due and owing to the Plaintiffs from Defendants HIGH-TECH and BLANCHETTE is \$16,672.50.
5. That the Plaintiffs have such other relief as the Court may deem just and equitable all at Defendant's cost, pursuant to 29 U.S.C. § 1132(g)(2)(E).

ORDERED BY:

HONORABLE JUDGE LEFKOW

Dated: _____